

1 GEOFFREY HANSEN
Acting Federal Public Defender
2 Northern District of California
3 DEJAN M. GANTAR
Assistant Federal Public Defender
4 55 South Market Street, Suite 820
San Jose, CA 95113
5 Telephone: (408) 291-7753
6 dejan_gantar@fd.org

7 Counsel for Defendant
8 HECTOR DAVILA-CHAVEZ

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10 UNITED STATES DISTRICT COURT
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12 NORTHERN DISTRICT OF CALIFORNIA
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14 SAN JOSE DIVISION

14 UNITED STATES OF AMERICA,
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16 Plaintiff,
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18 v.
19 HECTOR DAVILA-CHAVEZ,
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21 Defendant.

Case No. 19 Cr. 181 EJD

STIPULATION TO CONTINUE STATUS
CONFERENCE; ~~PROPOSED~~ ORDER

Before the Honorable Edward J. Davila
United States District Judge

STIPULATION

Defendant Hector Jesus Davila-Chavez, represented by AFPD Dejan M. Gantar, and the Government, represented by AUSA Jeff Nedrow and SAUSA Ann Koppuzha, respectfully request that the status conference currently scheduled for April 5, 2021 be continued to June 14, 2021.

The reason for the requested continuance is that defense counsel continues to conduct research and investigation regarding pretrial motions, which the parties anticipate will aid in discussions regarding potential disposition, and requires additional time toward that end. The parties anticipate that by the next status conference, they will inform the Court as to whether they have reached a resolution, or whether they will request the Court set a briefing schedule for pretrial motions.

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1 The parties further stipulate and agree that the time between April 5, 2021 and June 14,
2 2021 should be excluded from the period of time within which the defendant's trial must
3 commence pursuant to the Speedy Trial Act in order to allow counsel sufficient time to
4 effectively prepare, taking into account the exercise of due diligence. Furthermore, the parties
5 stipulate that the ends of justice served by granting the request outweigh the best interests of the
6 public and the defendant in a speedy trial.

7 IT IS SO STIPULATED.

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10 GEOFFREY HANSEN
Acting Federal Public Defender

11 DATED: March 29, 2021

12 /s/ *Dejan M. Gantar*
DEJAN M. GANTAR
Assistant Federal Public Defender

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14 /s/ *Jeff Nedrow*
JEFF NEDROW
Assistant United States Attorney

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16 /s/ *Ann Koppuzha*
ANN KOPPUZHA
Special Assistant United States Attorney

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19 *The filing attorney certifies that he has received written authorization to file this Stipulation
20 and [Proposed] Order on behalf of the non-filing attorney.

~~PROPOSED~~ ORDER

Pursuant to the parties' stipulation, and for good cause shown, the Court HEREBY ORDERS that the status conference for April 5, 2021 at 1:30 p.m. be continued to June 14, 2021 at 1:30 p.m. For good cause shown, the Court further finds that failing to exclude the time between April 5, 2021 and June 14, 2021 would deny counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and that the ends of justice served by excluding the time between April 5, 2021 and June 14, 2021 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial.

Therefore, IT IS HEREBY FURTHER ORDERED that the time between April 5, 2021 and June 14, 2021 shall be excluded from computation under the Speedy Trial Act.
18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

IT IS SO ORDERED.

DATED: 3/30/2021



THE HONORABLE EDWARD J. DAVILA
UNITED STATES DISTRICT JUDGE